

Subject: FR Notice Comments - 72FR23832: Draft Five-Year Plan

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Comments: As the skepticism of the relevancy of animal tests for human safety is becoming more and more prevalent among scientists, physicians and the public in general, it is heartening to see that Congress has finally asked NICEATM/ICCVAM to come up with a 5-year plan to research, develop and validate non-animal and other alternative reliable methods for integration into Federal Agency Testing programs. Public engagement on this issue is certainly a step in the right direction.

There is a considerable international effort in research and development, evaluation and validation of alternative (to animal testing) methods. ECVAM, the European counterpart of ICCVAM has successfully validated several alternative

methods for toxicity tests such as those for skin corrosion and absorption, vaccine potency, eye irritation, embryotoxicity, and so on. These methods have undergone extensive and successful international peer reviews (including US). Even after the validation, ICCVAM has accepted, to date, very few of these. Since ICCVAM was a part of the review process, efforts to duplicate these tests are clearly a waste of tax payer's money, not to mention delays in accepting methods which probably are more sensitive and more protective of public health.

ICCVAM should seriously recommend allocation of more federal funding for research and development of alternative methods to animal experimentation (accurate computer modeling, embryonic stem cell tests, use of cell cultures for toxicity reactions and human skin model tests to name a few). Encouragement should also be given to corporations and companies to fund more R&D efforts in this regard and to form international partnerships so that the methods developed in-house can be shared and added to a data base that would be available to the general research community. These methods, once successfully peer reviewed, should be quickly validated and accepted by ICCVAM so that companies can use them for testing their products.
